

Fact Sheet



For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-07900072-2013**

Application Received: **April 5, 2013**

Plant Identification Number: **07900072**

Permittee: **Toyota Motor Manufacturing West Virginia**

Facility Name: **Buffalo Plant**

Mailing Address: **1 Sugar Maple Lane, P.O.Box 600, Buffalo, WV 25033**

Issued: September 23, 2013

Physical Location:	Buffalo, Putnam County, West Virginia
UTM Coordinates:	413.518 km Easting • 4,272.153 km Northing • Zone 17
Directions:	The facility lies directly east of WV State Route 62 approximately one (1.0) mile south of Buffalo, WV.

Facility Description

Toyota Motor manufacturing West Virginia is primarily engaged in the manufacturing of automotive engines and automotive transmissions. As part of this manufacturing process, the plant contains machining, assembly, engine testing, and support operations. To support these operations, the plant is equipped with heating ventilation and air conditioning units, as well as various storage tanks (e.g., gasoline, motor oil, etc.). The SIC code for this facility is 3714.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2011 Actual Emissions
Carbon Monoxide (CO)	141.09	25.42
Nitrogen Oxides (NO _x)	85.61	10.1
Particulate Matter (PM _{2.5})	76.27	Not Reported
Particulate Matter (PM ₁₀)	76.27	Not Reported
Total Particulate Matter (TSP)	76.27	23.7
Sulfur Dioxide (SO ₂)	3.32	0.001
Volatile Organic Compounds (VOC)	246.73	53.8
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2011 Actual Emissions
Total HAPs	0.89	0.03

Some of the above HAPs may be counted as PM or VOCs.

Title V Program Applicability Basis

This facility has the potential to emit 246.73 tons/year of VOC and 141.09 tons/year of CO. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Toyota Motor Manufacturing West Virginia is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	Particulate from Indirect heat Exchangers
	45CSR6	Open burning prohibited.
	45CSR7	Particulate from Manufacturing
	45CSR10	SO ₂ from Indirect Heat exchangers
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Construction Permit
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR§§21-4, 5, 9, 19	Prevent and Control Emission of VOC's
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for HAPs
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 63, Subpart ZZZZ	NESHAP for Stationary Reciprocating Internal Combustion Engines

40 C.F.R. Part 82, Subpart F

Ozone depleting substances

State Only:

45CSR4

No objectionable odors.

45CSR§21-40

Prevent and Control Emission of VOC's

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
G60-B005	May 8, 2008	
R13-2062K	October 11, 2011	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table" which may be downloaded from DAQ's website.

Determinations and Justifications

This renewal addresses the following changes made to the most recently issued Title V permit:

1. Section 1.0 – Table A.5.a – 347 BHP is added to DG-5031 source description and Date constructed is changed from 2005 to 10-10-2005.
2. Section 1.0 – Table A.7.a – Due to updated information from the permittee, dates constructed for GEN-11E, GEN-11W and GEN-12 are changed from 2004 to 1-11-2005; for GEN-13 date constructed is changed from 2004 to 9-1-2004; for GEN-14 and GEN-15 date constructed is changed from 2006 to 8-14-2006; for GEN-IS date constructed is changed from 2006 to 10-23-2005; and for GEN-SBR date constructed is changed from 2006 to 2-18-2007.
3. Section 1.0 – 2 Fire Pumps are added under “Other Engines” because they are subject to 40 C.F.R. 63 Subpart ZZZZ. Their regulatory requirements are discussed below.
4. Boilerplate changes: The following changes have been made due to boilerplate changes:
 - a. Section 2.1.4 has been changed to reflect boilerplate change.
 - b. Section 3.1.3 regarding asbestos and the citation of the section has been changed due to change in boilerplate.
 - c. Paragraph d has been added to section 3.3.1 to reflect boilerplate change requiring reporting of stack test results.
 - d. Sections 3.5.3 and 3.5.5 are changed to include electronic report submittal to EPA.

5. In section 4.1.3, Table A.1.d is changed to A.1(c) which is the table designation in R13-2062K.
6. Section 8.0 – A new section is added for 40 C.F.R. 63 Subpart ZZZZ requirements for 5 emergency engines at the facility.

5 engines [GEN-11E, GEN-11W, GEN-12, GEN-13 & GEN-IS] are existing SI stationary emergency engines < 500 HP located at an area source of HAPs, constructed before June 12, 2006. Following are the 40 C.F.R. 63 Subpart ZZZZ requirements for these engines:
Compliance date is October 19, 2013.

Operating Limitations: 40 C.F.R. §63.6603, Table 2d.

Fuel Requirements: No Requirements.

Performance Tests: No Requirements.

Monitoring, Installation, Collection, Operation and Maintenance Requirements:
40 C.F.R. §§63.6625(e), (f), (h) and (j).

Initial Compliance: No requirements.

Continuous Compliance: 40 C.F.R. §§63.6605, 63.6640.

Notification Requirements: No requirements.

Recordkeeping Requirements: 40 C.F.R. §63.6655, except §§63.6655 (c).

Reporting Requirements: Footnote 2 of table 2d.

General Provisions (40 CFR part 63) - Table 8: Yes, except per 40 C.F.R. §63.6645(a)(5), the following do not apply: §§ 63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), and 63.9(b)-(e), (g) and (h).

7. Section 9.0 – A new section is added for 40 C.F.R. 63 Subpart ZZZZ requirements for Emergency Generator DG-5031 and 2 Fire pumps at the facility.

Emergency Generator DG-5031 and the two fire pumps are existing CI emergency stationary engines ≤ 500 HP located at an area source of HAPs, constructed before June 12, 2006. Following are the 40 C.F.R. 63 Subpart ZZZZ requirements for these engines:

Compliance date is May 3, 2013.

Emission Limitations: 40 C.F.R. §63.6603, Table 2d

Operating Limitations: No Requirements

Fuel Requirements: No Requirements

Performance Tests: No Requirements

Monitoring, Installation, Collection, Operation and Maintenance Requirements: 40 C.F.R. §§63.6625(e), (f), (h) and (i)

Initial Compliance: No Requirements

Continuous Compliance: 40 C.F.R. §§63.6605, 63.6640

Notification Requirements: No Requirements

Recordkeeping Requirements: 40 C.F.R. §63.6655, except §63.6655 (c).

Reporting Requirements: Footnote 2 of Table 2d.

General Provisions (40 CFR part 63) - Table 8: Yes, except per 40 C.F.R. §63.6645(a) (5), the following do not apply: 40 C.F.R. §§63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), and 63.9(b)-(e), (g) and (h).

8. GEN-14, GEN-15 and GEN-SBR are new emergency SI engines ≤ 500 HP located at an area source of HAPs, constructed after June 12, 2006. According to 40 C.F.R. §63.6590(c)(1), GEN-14, GEN-15 and GEN-SBR are subject to 40 C.F.R. 60 Subpart JJJJ, and no further requirements apply for such engines under 40 C.F.R. 63 Subpart ZZZZ.

According to 40 C.F.R. § 60.4230, the provisions of 40 C.F.R. 60 Subpart JJJJ are applicable to new SI engines less than 500 HP that commenced construction after June 12, 2006 and were manufactured on or after July 1, 2008. GEN-14, GEN-15 and GEN-SBR were constructed between 8-14-2006 and 2-18-2007, hence according to 40 C.F.R. § 60.4230, the provisions of 40 C.F.R. 60 Subpart JJJJ are not applicable to these engines.

9. 40 CFR 64 – Compliance Assurance Monitoring (CAM)

This is the second renewal of the facility. The facility has Potential to Emit greater than 100 tons per year of Carbon Monoxide and VOC. However, there is no single emissions unit that has pre-control device potential to emit equal to or greater than 100 percent of the amount, in tons per year, of any pollutant that would require the facility to be classified as a major source. According to 40CFR§64.2(a)(3), this facility is not subject to CAM.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

Greenhouse Gas Permitting. There have been no modifications to this facility that have triggered PSD permitting, thus there are no applicable greenhouse gas Clean Air Act requirements applicable to this facility.

Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date:	August 6, 2013
Ending Date:	September 5, 2013

Point of Contact

All written comments should be addressed to the following individual and office:

U.K.Bachhawat
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1256 • Fax: 304/926-0478
Udyot.K.Bachhawat@wv.gov

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

Not applicable.